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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARTHA SANCHEZ,

Plaintiff,

vs.

BERGENSONS PROPERTY SERVICES,
INC., a Delaware Corporation;
ADMINISTAFF COMPANIES II, LIMITED
PARTNERSHIP, A Delaware Limited
Partnership; ROE business organizations I-X;
DOE individuals I-X,

Defendants.

Case No.: 2:10-cv-01612-KJD-LRL

DISCOVERY PLAN AND SCHEDULING
ORDER
[Special Scheduling Review Requested]

Pursuant to Federal Rule of Civil Procedure 26(f), Defendants BERGENSONS
PROPERTY SERVICES, INC. and ADMINISTAFF COMPANIES II, LIMITED
PARTNERSHIP and Plaintiff, MARTHA SANCHEZ, through their respective counsel, submit
the following proposed Discovery Plan and Scheduling Order.

(1) Discovery Cut Off Date. The parties request a discovery period of one hundred
and eighty (180) days from December 21, 2010, the date the Early Neutral Evaluation will be
conducted. Counsel for both sides would like to push depositions and more costly discovery out
past the ENE to see if a settlement can be reached at the ENE. In addition, some of the witnesses
reside out of state and it will take longer to coordinate schedules and make travel arrangements
for these depositions. This can likely be done more efficiently after the upcoming holidays are
past. Therefore, the parties request that the discovery period close on **June 20, 2011.**

1 (2) Amending the Pleadings and Adding Parties. The date for filing motions to amend
2 the pleadings or to add parties shall not be later than ninety (90) days prior to the close of
3 discovery: **March 22, 2011.**

4 (3) Expert Witness Disclosures. The disclosure of any expert witnesses shall be made
5 sixty (60) days before the discovery deadline: **April 21, 2011.** The disclosures of any rebuttal
6 experts shall be due thirty (30) days after the initial disclosures of experts: **May 23, 2011.** The
7 requirements of F.R.C.P. 26(a) (2) (B) shall apply to any such disclosures.

8 (4) Dispositive Motions. Dispositive motions shall be filed not later than thirty (30)
9 days after the discovery cut-off date: **July 20, 2011.**

10 (5) Pretrial Order. The Joint Pretrial Order shall be filed not later than thirty (30) days
11 after the date set for filing dispositive motions: **August 19, 2011.** However, in the event that
12 dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until
13 thirty (30) days after a decision on the dispositive motions or further order of the Court.

14 (6) Rule 26(a) (3) Disclosures. The disclosures required by Rule 26(a) (3) and any
15 objection thereto shall be included in the Pretrial Order.

16 The parties will make their Initial Disclosures on or before **December 17, 2010.** No
17 changes need to be made in the timing, form or requirements for such disclosures.

18 (7) Electronically Stored Information. The parties have undertaken efforts to retain
19 any electronically stored information relevant to this matter and have agreed that the party
20 producing any electronically stored information need not provide such information in any certain
21 form as long as the form provides the other party (ies) reasonable access to the information. The
22 parties have further agreed that, to the extent any party seeks electronically stored information
23 that would be cumulative, burdensome or unduly costly to produce, counsel for the parties will
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1 confer in good faith to reach a mutual agreement regarding the production of such information.

2 (8) Protection of Privileged/Trial Preparation Materials. The parties prefer to handle
3 these issues on an ad hoc basis as no consensus can be reached in advance.

4 (9) Subjects on Which Discovery Will be Conducted. The parties are in agreement
5 that discovery will be needed on the Plaintiff's claims, Defendants' denials and the affirmative
6 defenses raised in the Answers. No changes should be made on the limitations of discovery
7 imposed under Federal Rules of Civil Procedure or local rules.

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9 Discovery does not need to be conducted in phases or limited or focused on particular
10 issues.

11 Dated this 15th Day of December 2010

12
13 /s/ James P. Kemp
14 James P. Kemp, Esq.
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24 Bergensons Property Services, Inc.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: 12-17-10